

49306900

January 27, 2014

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Office of Pesticide Programs  
U.S. Environmental Protection Agency  
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Attention: Ann Sibold  
Office of Pesticide Programs/Biopesticides and Pollution Prevention Division

mRID #

**RE: 2013 ABSTC Insect Resistance Management Compliance Assurance Program (CAP) 49306901**  
**Report for** Corn Borer-Protected Bt Corn (EPA Reg. Nos. 524-489, 29964-3, 67979-1, 68467-2),  
Corn Borer-Protected Pyramided Bt Corn (EPA Reg. Nos. 29964-7, 29964-12, 67979-12, 67979-15, and 67979-19), Corn Rootworm-Protected Bt Corn (EPA Reg. Nos. 524-551, 29964-4, 29964-10, 67979-5, and 68467-5), Corn Borer/Corn Rootworm-Protected Stacked Bt Corn (EPA Reg. Nos. 524-552, 524-576, 524-606, 29964-5, 29964-6, 29964-13, 67979-8, 67979-13, and 68467-6) and Corn Borer/Corn Rootworm-Protected Pyramided Bt Corn (EPA Reg. Nos. 524-575, 524-581, 524-595, 524-597, 29964-8, 29964-11, 29964-14, 29964-16, 67979-17, 67979-20, 68467-7, 68467-16)

Dear Ms. Sibold:

On behalf of the members of the Insect Resistance Management Stewardship Subcommittee (IRM Stewardship Subcommittee) of the Agricultural Biotechnology Stewardship Technical Committee (ABSTC), Arent Fox LLP is submitting this letter and seven (7) copies of the enclosed annual CAP report, "2013 Insect Resistance Management Compliance Assurance Program Report for Corn Borer-Protected Bt Corn, Corn Rootworm-Protected Bt Corn, Corn Borer/Corn Rootworm-Protected Stacked and Pyramided Bt Corn."

The IRM Stewardship Subcommittee members hold the following registrations of plant-incorporated protectants covered by this report: Monsanto Company (EPA Reg. Nos. 524-489, 524-551, 524-552, 524-576, 524-606, 524-575, 524-581, 524-595, 524-597); Dow AgroSciences LLC (EPA Reg. Nos. 68467-2, 68467-5, 68467-6, 68467-7, 68467-16); Syngenta Seeds, Inc. (EPA Reg. Nos. 67979-1; 67979-12, 67979-15, 67979-19, 67979-5, 67979-8, 67979-13, 67979-17, 67979-20); and Pioneer Hi-Bred International, Inc. (EPA Reg. No. 29964-3, 29964-7, 29964-12, 29964-4, 29964-10, 29964-5, 29964-6, 29964-13, 29964-8, 29964-11, 29964-14, 29964-16). Neither the IRM Stewardship Subcommittee, nor any of its members, makes any claims of confidentiality with regards to this submission.

Arent Fox

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On October 1, 2010, the US Environmental Protection Agency (EPA) issued registration extension letters to the *Bt* field corn registrants. These letters require, *inter alia*, the registrants to submit annually by January 31st a report summarizing the activities conducted under the CAP in the prior year, including results of a grower survey, and plans for the CAP during the current year. This report is submitted in response to that requirement and is the third report of activities conducted under the ABSTC Enhanced CAP submitted to the Agency on January 31, 2011.

If the Agency has any questions or concerns with this submission, please feel free to contact me.

Sincerely,



Stanley H. Abramson  
Authorized Representative of the  
Agricultural Biotechnology Stewardship  
Technical Committee

Enclosure

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